

Workgroup Report		At what stage is this document in the process?
IGT183: Maintenance criteria for Emergency Contact data held in Central Systems		01 Modification 02 Workgroup Report 03 Draft Modification Report 04 Final Modification Report
Purpose of Modification: IGT UNC Part I 1.15 a) outlines that the Central Data Services Provider (CDSP) has an Agency Function to maintain a record of Pipeline User emergency contact details. The CDSP also maintains a record of Consumer emergency contact details as per IGT UNC Part I 8.0 & 9.0. This Modification has been raised to outline the parameters in which Consumer emergency contact details are maintained and under what circumstances Consumer emergency contact details provided for Larger Supply Points below the Annual Quantity (AQ) threshold (see IGT UNC Part I 8.0 and 9.0) should be recorded and retained.		
	The Workgroup recommends that this Modification should: <i>(delete as appropriate)</i> - be subject to Self-Governance procedures - be further assessed by a Workgroup - proceed to Consultation - be implemented <i>(Code-specific)</i> The Panel will consider this Workgroup Report on [dd month year]. The Panel will consider the recommendations and determine the appropriate next steps.	
	High Impact: None	
	Medium Impact: Shippers, Independent Gas Transporters	
	Low Impact: None	
	Priority Category: Standard	

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Timetable		
Insert text here <i>(Insert explanatory text if timetable is amended)</i>		Contact: Code Administrator  iGTUNC@talan.com  02070901044
Modification timetable: <i>(amend as appropriate)</i>		Proposer: Insert name  email address  telephone
Initial consideration by Workgroup	dd month year	Other: Insert name
Amended Modification considered by Workgroup	dd month year	 email address.
Workgroup Report presented to Panel	dd month year	 telephone
Draft Modification Report issued for consultation	dd month year	Other: Insert name
Consultation Close-out for representations	dd month year	 email address.
Variation Request presented to Panel	dd month year	 telephone
Final Modification Report available for Panel	dd month year	Other: Insert name
Modification Panel decision	dd month year	 email address.
		 telephone

1 Summary

What

The CDSP currently maintains a record of Consumer emergency contact details on behalf of the Pipeline Operator. On receipt of this data from the Pipeline User, the CDSP provides these to the Pipeline Operator for use in the event of a Gas Emergency. (Please see IGT UNC Part I 8.0 & 9.0).

The Pipeline User (Shipper) is obligated to provide Consumer emergency contact details for Large Firm Supply Points to the relevant Pipeline Operator (IGT UNC Part I 8.0). In practice this obligation is fulfilled via Central Systems.

IGT UNC Part I 8.0 outlines that Consumer emergency contact details are mandatory for all 'Large Firm Supply Points'. (A Large Firm Supply Point has an AQ of $\geq 732,000\text{kWh}$, see IGT UNC Part I 1.3).

Although IGT UNC confirms that Consumer emergency contact details are mandatory for Supply Points with an AQ $\geq 732,000\text{kWh}$ s, the high-level criteria and treatment associated with providing, recording and maintaining emergency contact details is not stipulated.

This Modification seeks to provide this clarity, particularly around treatment of non-mandated Consumer emergency contact details where the AQ threshold is not met.

Please note that National Transmission System (NTS) Supply Points are within scope of this Modification as they typically have an AQ above the Large Firm Supply Point AQ threshold. It should be noted that IGT176¹ will introduce the concept of NTS Supply Points into IGT UNC. The anticipated implementation date for IGT176 is August 2026.

The CDSP also maintains a record of Consumer emergency contact details for Interruptible Supply Points. This Modification is seeking to amalgamate IGT UNC Part I 8.0 and 9.0 to reflect that there is no differentiation between the treatment of Large Firm Supply Point & Interruptible Supply Point contacts. This means that any Consumer emergency contact criteria which will apply to Large Firm Supply Points would also apply to Interruptible Supply Points unless explicitly stated otherwise.

There will also be a housekeeping change to IGT UNC 8.3 b) to reflect the rolling AQ process introduced post-Nexus.

Please note that an equivalent Modification UNC 0926S has been raised and is progressing at UNC Distribution Workgroup with almost identical Business Rules apart from the UNC Code references. There are a couple of minor differences in the Business Rules as UNC and IGT UNC sections on Consumer emergency contacts are not exactly the same. By raising an IGT UNC Modification, the intention is to ensure alignment between the two Codes and equal and consistent treatment of Consumer emergency contact details across them.

1 [IGT176 – Changes to IGT UNC to enable UNC0887 'Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS'](#)

Why

Pipeline Users can send in Consumer emergency contact data for Larger Supply Points, regardless of whether the AQ is $\geq 732,000\text{kWhs}$ or not, and UK Link currently records and maintains this data. Both UNC and IGT UNC are silent to what should happen to Consumer emergency contact data for Larger Supply Points (AQ $\geq 73,200\text{kWhs}$) that do not meet the minimum AQ requirement of a Large Firm Supply Point.

The Modification proposes that providing clarity to the criteria and treatment of Consumer emergency contact data will have a positive impact on the quality of the data. The Proposer is seeking to clarify when Consumer emergency contact details for Larger Supply Points will be recorded and maintained on UK Link, and to further clarify when historic Consumer emergency contact details may be retained in UK Link for extended periods of time if the Pipeline User does not send in new updated data.

The treatment and maintenance of Consumer emergency contacts for Interruptible Supply Points should also be considered as part of this Modification to ensure consistent handling of Consumer emergency contact details.

How

IGT UNC Part I 1.15 should be amended to clarify that as part of their Agency Function, the CDSP maintains Consumer as well as Pipeline User emergency contact details.

IGT UNC Part I 8.0 should be amended to outline the criteria in which the CDSP can record and maintain Consumer emergency contact details, particularly for Larger Supply Points which do not meet the classification of a Large Firm Supply Point.

IGT UNC Part I 8.0 and 9.0 should be combined as much as possible to ensure consistent handling of Consumer emergency contact details. Any specific exceptions to this will be called out in the Business Rules in Section 5.0 of this document.

2 Governance

Proposer justification for Self-Governance procedures

The Modification is suitable for Self-Governance as it is unlikely to have a material effect on “competition in the shipping, transportation or supply of gas conveyed through pipes or any commercial activities connected with the shipping, transportation or supply of gas conveyed through pipes.”

Prioritisation Criteria

Prioritisation Criteria	High Impact
Strongly aligns with the Strategic Direction Statement The Modification strongly supports key government energy policy actions that require immediate progress and aligns with SDS priorities under the Act Now category.	No
Complexity The Modification is highly complex, with a fast-approaching deadline, significant implementation challenges, and a requirement for extensive stakeholder engagement.	No

Importance The Modification addresses a high-risk or critical issue, making timely action important for stakeholders as it is anticipated to deliver substantial benefits and value.	No
Priority Category	Standard

The intent of this Modification is to be provide clarity and transparency on how Consumer emergency contact data is maintained within Central Systems. It does not strongly align with the Strategic Direction Statement or have a fast-approaching deadline that must be met. Although important, as it clarifies the retention and maintenance of emergency contact data on Central Systems, it is not a high-risk or critical issue. As a result, a Priority Category of Standard seems appropriate.

Proposer requested next steps

This Modification should:

- be considered a non-material change and subject to Self-Governance.
- be assessed by a Workgroup.

Workgroup discussions

[insert text]

3 Why Change?

The CDSP currently maintains a record of Consumer emergency contact details on behalf of the Pipeline Operator. On receipt of this data from the Pipeline User, the CDSP provides these to the Pipeline Operator for use in the event of a Gas Emergency. (Please see IGT UNC Part I 8.0 and 9.0)

The Pipeline User (Shipper) is obligated to provide Consumer emergency contact details for Large Firm Supply Points and for Interruptible Supply Points to the relevant Pipeline Operator (IGT UNC Part I 8.0 and 9.0).

IGT UNC Part I 8.0 outlines that Consumer emergency contact details are mandatory for all ‘Large Firm Supply Points’. (A Large Firm Supply Point has an AQ of ≥732,000kWh, see IGT UNC Part I 1.3).

Although IGT UNC confirms that Consumer emergency contact details are mandatory for Supply Points with an AQ ≥732,000kWhs, the high-level criteria and treatment associated with providing, recording and maintaining Consumer emergency contact details is not stipulated.

In practice, the CDSP can receive Consumer emergency contact details from Pipeline Users for Larger Supply Points (AQ ≥73,200kWhs) which do not meet the definition of a Large Firm Supply Point. In addition, when a Supply Point ceases to meet the AQ threshold of ≥732,000kWh, the CDSP will maintain the previously provided Consumer emergency contact details on UK Link as there is currently no requirement to remove these and operationally it was accepted that it was pragmatic to retain these in case a Supply Point regularly crosses this AQ threshold.

This Modification is seeking to clarify the criteria and treatment of recording and maintaining Consumer emergency contact details. This includes:

- where a Larger Supply Point ceases to meet the criteria of a Large Firm Supply Point;

- where a Larger Supply Point does not qualify as a Large Firm Supply Point on the date Consumer emergency contact details are received;
- where a Larger Supply Point has a Change of Supply Point event and Consumer emergency contact details are held in UK Link;
- an approach for Consumer emergency contact details which have been held in UK Link for a specific period of time;
- ensuring consistent treatment of Consumer emergency contacts for Large Firm Supply Points & Interruptible Supply Points. This includes:
 - max number of contacts for both Supply Point types to be 5 rather than 4;
 - Large Firm Supply Point Consumer emergency contact arrangements to apply to Interruptible Supply Point Consumer emergency contacts;
 - specific carve outs for Large Firm Supply Point Consumer emergency contacts & Interruptible Supply Point Consumer emergency contacts where required;
 - remove requirement for fax emergency contact details for both Supply Point types & replace with email.

Please note that NTS Supply Points are within scope of this Modification as they typically have an AQ above the Large Firm Supply Point AQ threshold.

Please note that an equivalent Modification UNC 0926S has been raised and is progressing at Distribution Workgroup with almost identical Business Rules apart from the UNC Code references. (There are a couple of minor differences in the Business Rules as UNC & IGT UNC sections on Consumer emergency contacts are not exactly the same). By raising an IGT UNC Modification, the intention is to ensure alignment between the two Codes and equal and consistent treatment of Consumer emergency contact details across Codes.

4 Code Specific Matters

Reference documents

IGT UNC Part I Clauses: 1.15 a), 8.0 and 9.0.

UNC TPD Q Clauses 1.14.1, 2.3 and 2.4

Knowledge/skills

Large Firm Supply Points, Interruptible Supply Points & Emergency Contacts

5 Solution

Business Rule 1:

BR1: In the case of Central Switching Service (CSS) Supply Points if there is a Change of Supply Point event, for a Supply Point that meets the criteria to provide Consumer emergency contact details, where the Proposing Pipeline User (Shipper) has not provided emergency contact details, the existing details for that Supply Point will continue to be maintained within UK Link and available to the relevant Pipeline Operator.

- **Note 1:** For the avoidance of doubt in the case of BR1, the Consumer emergency contact details provided by the previous Pipeline User will not be available to the Incoming Pipeline User. The Incoming Pipeline User will be prompted to provide new Consumer emergency contact details for the Supply Point.
- **Note 2:** IGT UNC Part CI 2.2 points across to Annex G-1. As part of UNC 0926S, Annex G-1 Table C, Group C – Consumer/Premises Details row 5 will be updated to clarify that the ‘default data item’ will be applied if the Supply Point meets the criteria of a Large Firm Supply Point or Interruptible Supply at Change of Supply Point event effective date. This only applies to CSS Supply Points. In layman’s terms this means the previous Pipeline User’s Consumer emergency contact details will be available to the Pipeline Operator if the Supply Point meets the definition of a Large Firm Supply Point or Interruptible Supply Point on the date the Supply Point changes ownership.

Business Rule 2:

BR2: The CDSP has permission to retain Consumer emergency contacts details in Central Systems as long as the mandatory criteria for Consumer emergency contact details are met, ie. Supply Point is a Large Firm Supply Point or an Interruptible Supply Point. The CDSP is also permitted to retain Consumer emergency contact details when the mandatory criteria is **not** met in two specific circumstances see BR2a & BR2b:

BR2a: For a Larger Supply Point that is not a Large Firm Supply Point or Interruptible Supply Point at the point that Consumer emergency contact details are provided, where a Pipeline User expects the Supply Point will become a Large Firm Supply Point or Interruptible Supply Point, they can provide Consumer emergency contact details to be held within UK Link.

By submitting this data when the mandatory criteria is not met, the Pipeline User warrants that the Larger Supply Point is expected to become a Large Firm Supply Point or Interruptible Supply Point within 12 months of submission of Consumer emergency contact data to Central Systems.

- If the Supply Point does not become an Interruptible Supply Point **or** move above the Large Firm Supply Point AQ threshold within a 12-month period of providing the Consumer emergency contact details, then the Consumer emergency contact details will be deleted as soon as practicable from UK Link by the CDSP;

For the avoidance of doubt, the process by which Consumer emergency contact details are deleted from UK Link once the 12-month period has elapsed will be determined during the DSC Change process.

For the avoidance of doubt if a Change of Supply Point event occurs when neither the Interruptible or Large Firm Supply Point criteria applies, then BR1 would apply.

For the avoidance of doubt, Consumer emergency contact details are only accepted into UK Link for Larger Supply Points (AQ >73,200kWhs).

BR2b: If Consumer emergency contact details are held for a Large Firm Supply Point or Interruptible Supply Point and that Supply Point ceases to be a Large Firm Supply Point or an Interruptible Supply Point for contiguous 12-month period, then the Consumer emergency contact details shall be retained by the CDSP for that 12-month period. (Subject to BR1). Once the 12-month period elapses, the Consumer emergency contact details shall be deleted by the CDSP from UK Link as soon as practicable.

For the avoidance of doubt, the process by which Consumer emergency contact details are deleted from UK Link once the 12-month period has elapsed will be determined during the DSC Change process. For the avoidance of doubt, the CDSP will notify the relevant Pipeline User if

Consumer emergency contact details are deleted from UK Link because the Supply Point does not meet the criteria and treatment of recording and maintaining Consumer emergency contact details.

Note 1

(Relates to Business Rule 1 & 2)

If the Consumer emergency contact details for a Large Firm Supply Point or an Interruptible Supply Point have been present against the Supply Point for >36 months, the Pipeline User of the Supply Point will be asked to check if the Consumer emergency contact details held within UK Link are still valid. Where they are not, the User will be responsible for updating UK Link with the correct Consumer emergency contact details. (Subject to BR1).

i) For the avoidance of doubt where a Pipeline User receives a notification to check Consumer emergency contact details, if no updates are received to UK Link, the CDSP will retain the Consumer emergency contact details against the Supply Point and the original effective date shall be maintained.

ii) It is expected that a new DSC Service Line will be added for this activity. The service line will stipulate the frequency of this reporting service rather than Code. Current expectation is that this will be an annual service in advance of the winter period.

Note 2:

Please note that NTS Supply Points are within scope of this Modification as they typically have an AQ above the Large Firm Supply Point AQ threshold. (NTS Supply Points will be introduced as a concept within IGT UNC when IGT 176 is implemented. Implementation is anticipated in August 2026).

Business Rule 3:

BR3: IGT UNC Part I 9.0 outlines the criteria for recording and maintaining Consumer emergency contacts for Interruptible Supply Points. Clause 9.0 should be deleted and Part I 8.0 (Large Firm Supply Points Consumer emergency contacts) amended to incorporate Interruptible Supply Point Consumer emergency contacts. This will ensure consistent treatment regardless of Supply Point type.

BR3a: IGT UNC Part I 9.1 a) refers to Registered Office details which are used as part of an Interruptible Supply Point bid. This reference is to be deleted from Part I as it does not relate to Consumer emergency contacts and reinserted into IGT UNC Part CIII Interruptible Supply Points;

IGT UNC Part I 8.1 a) refers to Registered Office details for Large Firm Supply Point Consumer emergency contact details. These details are not required for Consumer emergency contact details. This reference shall be deleted from IGT UNC in its entirety.

BR3b: IGT UNC 8.1 d) must be amended to apply to both Supply Point types. All Large Firm Supply Points & Interruptible Supply Points should have email provided regardless of AQ. IGT UNC 9.1 d) would be a duplication and should be deleted.

For the avoidance of doubt, Modification 0864/IGT 174 is anticipated to go live as part of DSC Change June 2026 release. The legal text for this Modification will amend the existing IGT UNC Part I 8.1 d) & 9.1 d) by removing the obligation for fax numbers and replace with an obligation to provide email addresses regardless of the AQ of the Supply Point. BR3b assumes that Modification 0864S/IGT 174 has already been implemented.

BR3c: Interruptible Supply Point Consumer emergency contact arrangements to be maintained consistently with those of Large Firm Supply Point Consumer emergency contact arrangements. This means:

- a. IGT UNC Part I 9.1 b) and c) are already covered by Part I 8.1 b) and c). Remove IGT UNC Part I 9.1 b) and c) and amend Part I 8.1 b) and c) to apply to **both** Supply Point types.
- b. IGT UNC Part I 9.3 and 9.4 are already covered by Part I 8.3 a) and 8.4 respectively. Remove IGT UNC Part I 9.3 and 9.4 and amend Part I 8.3 a) and 8.4 to apply to **both** Supply Point types.

BR3d: The number of Interruptible Supply Point Consumer emergency contacts shall align with the required number of Consumer emergency contacts for Large Firm Supply Points. This means:

- i. IGT UNC Part I 9.2 a) and b) shall be replaced by Part I 8.2 a) and b) and Part I 8.2 a) and b) shall be amended to apply for **both** Supply Point types.

For the avoidance of doubt, the maximum number of Consumer emergency contacts for both Supply Point types shall be 5.

BR3e: UNC 0926S legal text* states that CSEPs can be both Interruptible Supply Points & Large Firm Supply Points and therefore qualify for mandatory Consumer emergency contact details. There is no equivalent clause within IGT UNC Part I. This must be introduced as part of this change.

* See UNC 0926S legal text Section Q Clause 2.3.9.

Business Rule 4:

BR4: Clause IGT UNC Part I 8.3 b) should be amended to remove the end of the sub-clause which states: “and in any event not later than 30th September in that Gas Year.” Post Nexus, AQs can now change at any point during the Gas Year, so this has ceased to be relevant.

BR4a: Clause IGT UNC Part I 8.3 b) should be amended to make it clear that a Pipeline User must comply with Part I Clause 8.1 when a Supply Point becomes designated as Interruptible.

Note 1: Large Firm Supply Points are already explicitly called out under the existing UNC Part I 8.3b so no addition for Large Firm Supply Points is required.

Business Rule 5: IGT UNC Part I 1.15 a) to be amended to clarify that the CDSP’s agency function to support Part I is to continue to maintain a record of ‘Pipeline User emergency contact’ (1.15 a)) details but also to maintain a record of Consumer emergency contacts on behalf of the Pipeline Operators.

Workgroup discussions

[insert text]

6 Impacts & Other Considerations

Does this Modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

None

Consumer impacts

What is the current consumer experience?

Although IGT UNC Part I 8.0 and 9.0 confirm that Consumer emergency contact details are mandatory for Supply Points with an AQ $\geq 732,000\text{kWhs}$ and Interruptible Supply Points, the high-level criteria and treatment associated with providing, recording and maintaining Consumer emergency contact details is not stipulated in code.

This Modification also seeks to qualify when Consumer emergency contact details – for Larger Supply Points which do not meet the definition of a Large Firm Supply Point or Interruptible Supply Point – should be recorded and maintained in UK Link. It also seeks to qualify when the CDSP should issue a prompt to the Pipeline User to reverify their details.

The Modification intends to provide a consistent approach to managing Consumer emergency contact data for both Large Firm Supply Points and Interruptible Supply Points, ensuring that these contacts are maintained in the same way regardless of Supply Point type.

Greater transparency to Pipeline Users and Pipeline Operators on how this data is maintained will be highly beneficial to all parties.

What would the new consumer experience be?

The periodic data cleanse proposed by this Modification would prevent retention of historic/out of-date data and trigger the Pipeline User to send in new Consumer emergency contact details once a Supply Point becomes a Large Firm Supply Point or Interruptible Supply Point again.

Up to date contacts and improved data quality would allow Pipeline Operators, and Consumers, to act swiftly in the event of a gas emergency, enabling the Gas Industry to meet its safety obligations. In addition, provision of up-to-date contacts should reduce frustration on the part of historic Consumers being wrongly contacted.

Impact of the change on Consumer Benefit Areas	
Area	Identified Impact
Improved safety and reliability	Positive
Lower bills than would otherwise be the case	None
Reduced environmental damage	None
Improved quality of service	Positive
Benefits for society as a whole	None

Cross-Code impacts

Please note that an equivalent Modification (UNC 0926S) has been raised and is progressing at UNC Distribution Workgroup with almost identical Business Rules apart from the UNC Code references. There

are a couple of minor differences in the Business Rules as UNC and IGT UNC sections on Consumer emergency contacts are not exactly the same. By raising an IGT UNC Modification, the intention is to ensure alignment between the two Codes and equal and consistent treatment of Consumer emergency contact details across them.

UNC	☒
REC	☐
Other	☐
None	☐

Environmental Impacts

None

Workgroup discussions

[insert text]

7 Relevant Objectives

Impact of the Modification on the Relevant Objectives:	
Relevant Objective	Identified impact
(A) Efficient and economic operation of the pipe-line system	None
(B) Co-ordinated, efficient and economic operation of (i) the combined pipe-line system; and/or (ii) the pipe-line system of one or more other relevant gas transporters	None
(C) Efficient discharge of the licensee’s obligations	None
(D) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation agreements with other relevant gas transporters) and relevant shippers	None
(E) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers	None
(F) Promotion of efficiency in the implementation and administration of the Code	Positive

(G) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators

None

This Modification will have a positive impact on Relevant Objective (F).

In IGT UNC Part I there are Code obligations placed on the Pipeline User for Large Firm Supply Points (8.0) and Interruptible Supply Points (9.0) to provide Consumer emergency contact data.

This Modification seeks to add clarity within the IGT UNC on how Consumer emergency contact details should be recorded and maintained, this will promote efficiencies for these obligations. Furthermore, by ensuring that Consumer emergency contacts for Interruptible Supply Points and Large Firm Supply Points are maintained as per the same criteria, we will ensure consistency regardless of Supply Point type.

Raising an IGT equivalent Modification to UNC 0926S also ensures consistent treatment of Consumer emergency contact data across the IGT UNC and the UNC.

Workgroup discussions

[insert text]

8 Implementation

Proposed implementation approach

As Self-Governance procedures are proposed, implementation could be sixteen business days after a Modification Panel decision to implement, subject to no Appeal being raised.

As this Modification will have Central System impacts, the implementation effective date of this Modification will be determined by the DSC Change Management Committee.

Workgroup discussions

[insert text]

9 Legal Text

Draft legal text

The draft legal text for this Modification can be found on the [IGT183 webpage](#).

Workgroup discussions

[insert text]

10 Recommendations

Workgroup's Recommendation to Panel

The Workgroup asks Panel to agree that:

- This [Self-Governance] Modification should proceed to consultation.

- This proposal requires further assessment and should be returned to Workgroup.

The Code Administrator may set alternative subheadings appropriate to the specific Code.

Insert subheading here

Insert text here